

# EXHIBIT B

**PROPOSED DOCUMENT REQUESTS**

1. Documents arising out of or related to the decision to terminate, and the resulting June 7, 2022, termination of, (i) Ramona Thurman Bivins's (Bivins) position as Chief Financial Officer (CFO) for the Clayton County Board of Commissioners (the Board) and (ii) Bivins's June 2019 Employment Agreement.

2. Written communications, including, without limitation, text messages and emails, to or from Clayton County Commissioner Felicia Franklin (Franklin) referencing, related to, or addressing why the Board terminated both Bivins *and* her employment agreement on June 7, 2022.

3. Written communications, including, without limitation, text messages and emails, to or from Clayton County Commissioner Alieka Anderson (Anderson) referencing, related to, or addressing why the Board terminated both Bivins *and* her employment agreement on June 7, 2022.

4. Written communications, including, without limitation, text messages and emails, to or from Clayton County Commissioner Gail Hambrick (Hambrick) referencing, related to, or addressing why the Board terminated both Bivins *and* her employment agreement on June 7, 2022.

5. Written communications, including, without limitation, text messages and emails, to or from Clayton County Commissioner Jeffrey Turner (Turner)

referencing, related to, or addressing why the Board terminated both Bivins *and* her employment agreement on June 7, 2022.

6. Written communications, including, without limitation, text messages and emails, to or from Clayton County Commissioner DeMont Davis (Davis) referencing, related to, or addressing why the Board terminated both Bivins *and* her employment agreement on June 7, 2022.

7. Written communications, including, without limitation, text messages and emails, exchanged by and between Franklin and former Clayton County Sheriff Victor Hill, and which reference or relate to Bivins, Bivins's husband Charlton Bivins, Davis, Turner and/or former 2022 Board candidate Janice Scott.

8. All written communications, including, without limitation, text messages and emails, exchanged by and between Anderson and former Clayton County Sheriff Victor Hill, and which reference or relate to Bivins, Bivins's husband Charlton Bivins, Davis, Turner and/or former 2022 Board candidate Janice Scott.

9. All written communications, including, without limitation, text messages and emails, exchanged by and between Hambrick and former Clayton County Sheriff Victor Hill, and which reference or relate to Bivins, Bivins's husband Charlton Bivins, Davis, Turner and/or former 2022 Board candidate Janice Scott.

10. Emails or text messages/group texts exchanged by, between and/or among Franklin, Anderson, or Hambrick from April 2022 through December 2022, and which reference or relate to Bivins, Bivins's husband Charlton Bivins, Bivins's June 2019 employment agreement, Bivins's June 7, 2022 termination, Davis, or former 2022 Board candidate Janice Scott.

11. Emails or text messages/group texts exchanged by, between and/or among Franklin, Anderson, or Hambrick from April 2022 through December 2022, and which include any reference to Bivins's June 2019 "Employment Agreement" being "void," "unenforceable," or "ultra vires."

12. Documents reflecting all contracts, employment or otherwise, that the Board has declared "ultra vires" and terminated from January 2018 through the date of your response.

13. Documents reflecting why, on September 6, 2022, the Board voted 3-2 to "initiate procedures to recoup payments made to Vanderbilt University on behalf of former Clayton County Chief Financial Officer Ramona Bivins[.]"

14. Documents reflecting why on or about August 11, 2022 Clayton County filed an appeal with the Georgia Department of Labor challenging that Department's decision to award Bivins unemployment benefits.

15. Documents referencing or related to the “Severance” identified in Section 7 of Bivins’s June 2019 employment agreement.

16. Texts and emails exchanged between Franklin and Clayton Crescent reporter Robin Kemp in May or June 2022.

17. Texts and emails exchanged between Anderson and Clayton Crescent reporter Robin Kemp in May or June 2022.

18. Texts and emails exchanged between Hambrick and Clayton Crescent reporter Robin Kemp in May or June 2022.

19. Texts and emails exchanged between Franklin and the Clayton County Police Department in May or June 2022.

20. Texts and emails exchanged between Anderson and the Clayton County Police Department in May or June 2022.

21. Texts and emails exchanged between Hambrick and the Clayton County Police Department in May or June 2022.

22. Records arising out of or related to Franklin’s, Anderson’s and/or Hambrick’s investigation into Clayton County paying for Bivins’s tuition for courses taken at or through Vanderbilt University.

23. Emails or text messages/group texts exchanged by, between and/or among Franklin, Anderson, and Hambrick that reference or relate to *Bivins v.*

*Franklin, et al.*, United States District Court for the Northern District of Georgia;  
Civil Action No. 1:22-cv-04149-WMR.